

## **BRADY/GIGLIO TIMELINE**

<b>DATE</b>	<b>EVENT</b>
<b>1/12/24</b>	<b>King filed a motion for bond, under seal, with no written response from the Government</b>
<b>1/17/2024</b>	<b>Hearing on motion for bond after which King was released on conditions</b>
<b>10/28/2024</b>	<b>Defense filed a motion for bond review, under seal, with no written response from the Government</b>
<b>11/5/2024</b>	<b>Bond review hearing in which “the parties jointly requested” that King be permitted to remain on bond</b>
<b>12/8/2024</b>	<b>Psychologist Raghavan issues a new report for King based on new interviews with King on 10/9 &amp; 10/15/2024 that is inconsistent with the report she authored in the fall of 2022</b>
<b>12/??/2024</b>	<b>Government received a copy of the new report</b>

<b>01/??/2025</b>	<b>Government makes decision to recommend a thirty-month sentence for King pursuant to Sentencing Guideline 5K1.1</b>
<b>01/??/2025</b>	<b>Government communicates its proposed 5K recommendation to counsel for King</b>
<b>1/13/2025</b>	<b>Defense files Motion for Disclosure of PSR and Other Required Information</b>
<b>1/17/2025</b>	<b>Government files response arguing that defendant has received everything he is entitled to under <i>Brady/Giglio</i></b>
<b>1/20/2025</b>	<b>Defense files a reply to Government's response.</b>
<b>1/24/2025</b>	<b>Hearing on defense motion set for 2/10/2025</b>
<b>2/5/2025</b>	<b>Government provided the following in response to defense motion for disclosure:</b>

- 1. 5K recommendation will be 30 months, a 50% reduction from the statutory cap of five years;**
- 2. Acknowledgement that Government had not opposed King's requests for bond, although minute entry for 11/2024 bond hearing states that Government affirmatively joined in the motion**
- 3. Advised of the existence of Raghavan's second report with the suggestion that the defense seek a copy of the report through the judge**

**2/7/2025**

**Government, upon inquiry from the defense, acknowledged that it possessed a copy of Raghavan's second report and provided a redacted version of that report three days before the scheduled hearing on the defense motion to disclose.**

**Government excused the failure to provide the report earlier by alleging that it believed the defense would have received the report from King's attorneys**

**2/10/2025**

**Hearing on defense motion for disclosure. During the hearing, the Court inquired as to when the Government obtained the Raghavan report.**

**Government admitted that it had possession of the report since November. Government excused the failure to provide the report earlier because Government counsel was out of the office.**

**Government's claim:**

- 1. ignores the fact that co-counsel on the case was available when the report was received and could have provided the report to the defense earlier than three days before the hearing;**
- 2. ignores fact that Government lead counsel was actually back in the office on January 17, 2025 when the Government's response to motion to disclose was filed;**
- 3. was inconsistent with the excuse provided to the defense on February 7, 2025 for not tendering the report earlier**